

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)**

STEVEN JOHN ROWLAND,

Plaintiff,

v.

JEGATHEESWARAN
BALASUPRAMANIYAM; TPINE
LEASING CAPITAL CORPORATION; and
SKYLINE TRANSPORT, INC.,

Defendants.

Case No. _____

NOTICE OF REMOVAL

Pursuant to 28 U.S.C. §§ 1441, and 1446, defendant TPine Leasing Capital Corporation (“Defendant” or “TPine”), hereby files this notice of removal of the above-entitled civil action, now pending in the Circuit Court of Fauquier County, CL 20000455-00, to the United States District Court for the Eastern District of Virginia, Alexandria Division. In support of removal, Defendants state as follows:

Facts Giving Rise to Jurisdiction

1. Plaintiff commenced this personal injury action in the Circuit Court of Fauquier County, against Defendants seeking \$200,000 dollars in damages for injuries purportedly sustained in a car accident that occurred in Fauquier County, Virginia, on November 9, 2018. (**Ex. 1, Compl.**)

2. Plaintiff Steven John Rowland is a citizen of Virginia. (**Ex. 2, Police Report**).

3. Defendant Jegatheeswaran Balasupramaniyam is a citizen of Ontario, Canada.

4. Defendant TPine Leasing Capital Corporation is a Canadian corporation with its principal place of business in Ontario, Canada.

5. Defendant Skyline Transport, Inc. is a Canadian corporation with its principal place of business in Ontario, Canada.

Legal Basis for Jurisdiction

6. Removal of this action is proper under 28 U.S.C. § 1332, as there is complete diversity between the parties and the amount in controversy exceeds \$75,000.00.

7. Defendant TPine was first served in this action on October 1, 2021. This Notice of Removal is thus timely filed pursuant to 28 U.S.C. § 1446(b).

8. As required by 28 U.S.C. § 1446(b), true and correct copies of the process and pleadings served upon Defendant TPine are being filed with this notice of removal. (**Ex. 1, Compl.**)

9. Pursuant to 28 U.S.C. § 1446(d), a copy of this notice of removal is being served on all parties and filed with the Circuit Court of Fauquier County.

10. To date, no other defendant has made an appearance in this case.

WHEREFORE, Defendant prays that this action proceed in this Court as an action properly removed thereto.

Dated: October 21, 2021

Respectfully Submitted,

TPINE LEASING CAPITAL CORPORATION
By Counsel

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/s/ Peter M. Moore
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 21st day of October, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system and thereby served all counsel of record.

/s/ Peter M. Moore
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